

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS PAFFORD TO INTERROGATORIES OF
UNITED PARCEL SERVICE
(UPS/USPS-T4-9-10)
(March 13, 2000)

The United States Postal Service hereby provides the responses of witness Pafford to the following interrogatories of United Parcel Service: UPS/USPS-T4-9-10, filed on February 29, 2000. Interrogatory UPS/USPS-T4-8 was redirected to witness Hunter.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

K N Hollies
Kenneth N. Hollies

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PAFFORD TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T4-8. Library Reference USPS-LR-I-30, Appendix E, shows revenue, pieces, and weight estimates multiplied by 1.00920754219 for non-automated office data, mail type "PI-SB-PARCELP."

- (a) Explain why this factor is used on the parcel mail type, but not any other types.
- (b) Explain in detail how this factor was developed and provide copies of all analyses and supporting documents used in the development process. Provide the information in electronic format, in originally developed form with formulas intact.

RESPONSE:

This interrogatory has been redirected to witness Hunter.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PAFFORD TO
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UPS/USPS-T4-9. Library Reference USPS-LR-I-30, Appendix I, states: "THIS PROGRAM CREATES THE GOVERNMENT FISCAL YEAR RPW ESTIMATES. IT ROLLS UP QUARTERS 0,2,3, AND 5 TO PRODUCE RPW RATE CATEGORY AND SUMMARY CATEGORY ESTIMATES."

- (a) Define what months are included in quarters 0, 2, 3, and 5, separately.
- (b) Are the data in these quarters only 1998 data, or are data from other years included?
- (c) If data from other years are included, which other years? Why are data from other years included? Explain in detail.
- (d) If data from other years are included, please provide revenue, weight, and piece proportion information for 1998 by mail category and subclass. That is, how much of the revenue, weight, and piece information in each mail category is 1998 data?

RESPONSE:

- (a) Government Fiscal Year 1998 is October 1, 1997-September 30, 1998.

The following months are included in Quarters 0, 2, 3, and 5:

Quarter 0	October 1, 1997 -- December 5, 1997
Quarter 2	December 6, 1997 -- February 27, 1998
Quarter 3	February 28, 1998 -- May 22, 1998
Quarter 5	May 23, 1998 -- September 30, 1998

- (b-d) Only Government Fiscal Year 1998 RPW data are included in Quarters 0, 2, 3, and 5.

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UPS/USPS-T4-10. Refer to Library Reference USPS-LR-I-30, Appendix J.

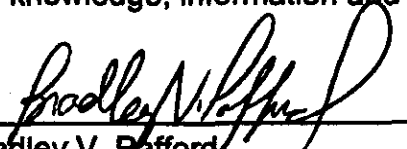
- (a) Provide this file in electronic spreadsheet format with formulas intact and maintained as originally developed.
- (b) Explain in detail the purpose of this file, the sources of data that are used in this file, and where the results of this file are used in RPW reporting.
- (c) Are data other than 1998 data used in this file? If yes, please explain in detail why.

RESPONSE:

- (a) The file is being made available as USPS-LR-I-227, Material Provided in Response to UPS/USPS-T4-10 (Pafford).
- (b) The purpose of this file, its use in RPW reporting, and sources are described in Library Reference USPS-LR-I-30 in the system module section under module 3a (page 5) and in the system inputs and outputs section under module 3a (page 7).
- (c) No.

DECLARATION

I, Bradley V. Pafford, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.


Bradley V. Pafford

Date: March 13, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

K N Hollies
Kenneth N. Hollies

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March 13, 2000